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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of	)	
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Revision of the Commission's	)	CC Docket No. 94-102
Rules to Ensure Compatibility	)	
with Enhanced 911 Emergency	)	
Calling Systems	)	
	)	

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

AMENDED E911 PHASE II
REPORT OF TRITON PCS LICENSE COMPANY, L.L.C.

Triton PCS License Company L.L.C. (hereafter "Triton"), by its attorneys, hereby submits its Amended Report regarding its current plans for implementation of wireless Enhanced 911 ("E911") Phase II automatic location information ("ALI") systems in its commercial mobile wireless operations. On November 9, 2000, Triton filed a report on its plans for implementation of its wireless E911 solution.[1] In that Report, Triton stated that is was not in a position to choose between a handset-based or network based E911 solution, but committed to filing an amended report as soon as possible. Based on decisions now made regarding handset-based technology, Triton now believes that a handset-based Phase II technology solution is its best option for Phase II implementation.

This Amended Report reflects Triton's most current E911 plans. Based on vendor availability, consumer acceptance, changes in equipment availability, new testing results or technology developments and similar factors, however, Triton anticipates that it may need to

[1] *See* Report of Triton PCS License Company, LLC, CC Docket No. 94-102 (filed November 9, 2000) (Report).

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submit an update to this Amended Report in accordance with the instructions contained in the Commission's September 14, 2000 Public Notice.[2]

I. Background/Contact Information

A. Triton's History

As stated in its November 9 Report, Triton PCS License Company, L.L.C., through its parent, Triton PCS Holding Company, Inc., is the first member of the AT&T Wireless Services Inc. network of affiliates. Triton is licensed to build and operate a digital wireless network in a contiguous area covering approximately 13 million people in Virginia, North and South Carolina, northern Georgia, northeastern Tennessee and southern Kentucky.

The company markets its wireless services under the brand SunCom, a member of the AT&T Wireless Network. Triton PCS completed its initial network build-out and began providing service to its customers in January 1999. It has since launched service in 37 markets. Currently, Triton operates a network of seven mobile switches and over 1500 cell sites. Among its initial markets are Virginia's largest city, Norfolk-Virginia Beach, and its state capital, Richmond, as well as Charleston, Columbia, Greenville-Spartanburg and Myrtle Beach in South Carolina, and Augusta, Georgia. Triton's TRS Number is **817978.**

B. Triton's Contact Information

For the purpose of responding to the Commission's inquiries on Triton's current plans for E911 Phase II, Triton's contact information is as follows:

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[2] Wireless Telecommunications Bureau Provides Guidance on Carrier Reports on Implementation of Wireless E911 Phase II Automatic Location Identification, *Public Notice*, CC Docket No. 94-102, DA 00-2099 (rel. September 14, 2000).

Triton PCS
Glen Robinson
Senior Vice President of Engineering
and Information Technologies
1100 Cassatt Road
Berwyn, PA 19312
Telephone: (610) 722-4424
Facsimile: (610) 993-2683
E-Mail: grobinson@tritonpcs.com

II. E911 Phase II Location Technology Information

A. Type of Technology

Triton's handset vendors include Ericsson, Nokia and Motorola. Presently, Triton is working with these vendors to implement a Phase II handset-based solution that will fully satisfy the Commission's implementation, penetration and accuracy requirements, as well as bring Phase II Automatic Location Information ("ALI") E911 service to its subscribers in the shortest possible timeframe.

As part of its continuing efforts, Triton is working to develop a handset-based ALI solution through the introduction of global positioning system ("GPS") technology in subscriber handsets. Triton has been working with its handset equipment vendors to ascertain what capabilities they are designing and at what price and time period compliant handsets could be made available commercially in large quantities.[3] Triton expects to employ the same handset-based solution across all of its markets.

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[3] It should be noted that while Triton believes that a handset-based Phase II technology solution might be its best option for Phase II compliance, it is nonetheless concerned over the cost of integration of the GPS technology into handsets – the integration will increase the price of a handset $40 to $50. Moreover, Triton's handset vendors have represented to Triton that handsets with the requisite ALI capability may not be available until sometime after October 1, 2001. Thus, while Triton continues to work to implement its handset-based Phase II solution, it is

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B. Testing and Verification

As a member of the AT&T Wireless Network, Triton has access to AT&T's significant research and development resources. Triton has made use of the results of AT&T's testing of handset and network-based approaches in making comparative evaluations. With respect to the handset testing, AT&T has issued an RFI to its major handset vendors to obtain their input on potential handset-based solutions, and engaged in detailed follow up discussions with each vendor on a number of issues regarding the vendor's preferred handset-based location technology, including timing, model availability, network impacts, Third Generation ("3G") wireless plans, and cost trends. In anticipation of handset-based solutions becoming available, AT&T currently is working on air-interface standards for communicating handset-based location information to position-determination equipment.

To date Triton has not performed its own testing of the handset technologies. However, Triton will test the efficacy and accuracy of any handset-based solution as those solutions are

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concerned that this solution cannot be realized without a waiver or some modification to the Commission's Phase II handset activation schedule. Triton also is concerned over the possibility that customers will be unwilling initially to purchase the new compliant handsets, thus making the handset penetration rates the Commission's rules currently require wholly dependant on customer acceptance. Indeed, should customers find the handset to be larger, awkward or otherwise unacceptable, carriers, like Triton, through no fault of their own, may be unable to reach the Commission's handset penetration requirements. This is a critical issue for carriers who would welcome additional guidance from the Commission on how it intends to address the customer acceptance aspect of its activation requirement.

phased-in in accordance with the Commission's guidelines[4] and as described in Section C, below.

C. Implementation Details and Schedule

In order to operate a handset-based Phase II system, Triton will purchase and introduce GPS capable handsets into its markets after verification that the quality of performance of these handsets meets the standards for call quality and interoperability with other networks of the handsets currently offered to its subscribers. Testing will also have to be done to verify the ALI accuracy of the handsets.

Triton anticipates that it will phase-in the deployment of a hand-set based solution using the priorities established in the Commission's new implementation schedule. Specifically, Triton anticipates that it will begin selling and activating ALI-capable handsets by October 1, 2001. By December 31, 2001, Triton expects to have at least 25 percent of all new ALI-capable handsets activated and 50 percent by June 30, 2002. By December 31, 2002 and thereafter, Triton will use its reasonable efforts to have 100 percent of all new digital ALI-capable handsets activated. Triton expects to achieve full penetration (95 percent) of ALI-capable handsets in its total subscriber base by December 31, 2005.[5]

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[4] *See* Guidelines for Testing and Verifying the Accuracy of Wireless E911 Location Systems, OET Bulletin No. 71, April 12, 2000.

[5] The plan and schedule for implementation for a handset-based solution will depend considerably on adequate handset availability. As stated previously, certain vendors have represented that the required handset capability may not be available until sometime after October 1, 2001. Triton's estimated implementation and handset penetration schedule is also dependent on customers' satisfaction with and willingness to purchase the new compliant handsets.

D. PSAP Interface

In addition to the hardware and software changes necessary to accommodate a working handset-based Phase II solution, there may be hardware and software changes necessary to transmit Phase II data to PSAPs. Specifically, Triton anticipates that a new piece of hardware will be necessary to collect network-based data, process it appropriately and deliver it to the relevant PSAP for its use. While that additional device or devices may be located at a centralized point or points within Triton's network, the device will have to be optimized to integrate with PSAP systems and the connectivity Triton has deployed to PSAPs for Phase I information delivery. This process will occur on a market-by-market basis as individual PSAPs request delivery of Phase II ANI data. The schedule for installing the switch software and the hardware and software for interfacing to the PSAPs would be determined by the timing of the requests received from the PSAPs. Triton will be prepared by October 1, 2001, or within 6 months of a request from a PSAP, whichever is later.

E. Existing Handsets

Triton will advertise the new E911 handset capability and encourage its subscribers to replace existing handsets.

F. Location of Non-Compatible Handsets

Those non-subscribers to Triton service with network-based systems roaming into a Triton market will receive Phase I capabilities, as will Triton's subscribers that have not yet upgraded their handsets.

G. Other Information

Triton is committed to meeting the Commission's established timetables for the deployment of Phase II ALI capabilities. Triton notes, however, that it does not control the delivery timetables of equipment manufacturers and, despite all its intended testing and optimization of a handset-based solution, Triton ultimately cannot guarantee that the technology will consistently deliver the degree of accuracy the Commission's rules mandate. While Triton certainly hopes that all handsets or systems perform at a high degree of precision and achieve immediate, successful integration, it is possible that Triton may have to seek rule waivers where integration or accuracy cannot be achieved within the Commission's mandated timeframes.

III. Conclusion

Triton is committed to implementing a handset-based E911 Phase II solution within the time frame and with the levels of ALI accuracy specified by the Commission. It is possible that manufacturers may develop or enhance technologies over the next twelve months such that Triton would reconsider its current plan to deploy a handset-based ALI solution. Pursuant to the instructions in the Public Notice, Triton will submit a new report promptly upon any determination to implement a different technology for Phase II E911 than the handset-based

approach outlined in this report. If questions should arise in connection with this E911 report, please contact the undersigned.

Respectfully submitted,

TRITON PCS LICENSE COMPANY, L.L.C.

Laura H. Phillips
Laura S. Roecklein

Its Attorneys

Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036
(202) 776-2000

Triton PCS
Glen Robinson
Senior Vice President of Engineering
and Information Technologies
1100 Cassatt Road
Berwyn, PA 19312
(610) 722-4424

December 21, 2000

CERTIFICATE OF SERVICE

I, Roberta L. Rosser, a Legal Secretary in the law firm of Dow, Lohnes & Albertson, do hereby certify that on this 21st day of December, 2000, I caused copies of the Amended Report of Triton PCS License Company, L.L.C. to be sent via hand-delivery to the following:

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

International Transcription Service, Inc.
CY-B400
1231 20th Street, N.W.
Washington, DC 20036

Thomas J. Sugrue, Chief
Wireless Telecommunications Bureau
Room 3-C252
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Daniel F. Grosh
Senior Attorney
Wireless Telecommunications Bureau
Room 3-A221
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Wendy Austrie
Policy Division
Wireless Telecommunications Bureau
Room 4-A425
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Roberta L. Rosser

Roberta L. Rosser